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**MILFORD RIVET & MACHINE CO.**  
 PENN. DIVISION HAYBORO PA 19040

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JANUARY 24, 1972

MISS CHARLOTTE E. PETERSON, ACTING CHIEF  
 ENFORCEMENT & ADMINISTRATIVE SECTION  
 DEPARTMENT OF ENVIRONMENTAL RESOURCES  
 1875 NEW HOPE STREET  
 NORRISTOWN, PA. 19401

DEAR MISS PETERSON:

MILFORD RIVET & MACHINE CO. RECEIVED A VIOLATION NOTICE DATED NOVEMBER 26, 1971 REGARDING FOUR IMPOUNDMENTS PRESENTLY IN USE BY THE COMPANY. THE VIOLATION WAS BASED ON THE DEPARTMENT'S RULES AND REGULATIONS, AMENDED ARTICLE 800, SECTION 1 & 2, WHICH REQUIRES THAT ALL IMPOUNDMENTS MEET THE FOLLOWING FOUR CONDITIONS:

1. STRUCTURALLY SOUND
2. IMPERMEABLE
3. PROTECTED AGAINST ACTIONS OF THIRD PARTIES
4. MINIMUM OF TWO FEET FREEBOARD AT ALL TIMES

IT WAS JUDGED THAT THE LAGOONS DID NOT SATISFY THE IMPERMEABLE CONDITION.

UPON RECEIPT OF THE ABOVE MENTIONED NOTICE, BETZ ENVIRONMENTAL ENGINEERS WAS CONTRACTED TO RECOMMEND IMPROVEMENTS NECESSARY TO INSURE COMPLIANCE WITH THE FOUR CONDITIONS. BASED ON THE CONSULTANTS REPORT, MILFORD RIVET AND MACHINE COMPANY HAS DECIDED TO INSTALL A CONCRETE LINER IN ITS FOUR LAGOONS. AS THE LAGOONS ARE PART OF AN EXISTING WASTE TREATMENT SYSTEM, WITH DISCHARGE TO THE SANITARY SEWER, THE COMPANY PLANS TO INSTALL THE LINERS DURING A SCHEDULED PLANT SHUTDOWN IN JULY, 1972. DETAILED PLANS ARE CURRENTLY BEING PREPARED AND WILL BE FORWARDED WHEN COMPLETED.

BASED ON THE ABOVE INFORMATION, MILFORD RIVET REQUESTS THAT A VARIANCE BE GRANTED UNTIL AUGUST 1, 1972 TO ALLOW FOR INSTALLATION DURING THE JULY SHUTDOWN. IT IS ALSO REQUESTED THAT UPON RECEIPT OF DETAILED PLANS, A DECISION BE REACHED CONCERNING THE NECESSITY OF A PERMIT FOR THE LAGOONS.

IF ADDITIONAL INFORMATION IS REQUIRED, PLEASE ADVISE.

VERY TRULY YOURS  
 THE MILFORD RIVET & MACHINE CO.

*T. F. Sahm*

T. F. SAHM, DIVISIONAL MANAGER

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TFS/GSW